

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

ET Docket No. 97-99

Amendment of the Commission's Rules)
 To Relocate the Digital Electronic Message)
 Service From the 18 GHz Band to the)
 24 GHz Band and To Allocate the)
 24 GHz Band for Fixed Service)

MILLIMETER WAVE CARRIER ASSOCIATION, INC.
REQUEST FOR LEAVE TO EXCEED PAGE LIMIT

The Millimeter Wave Carrier Association, Inc. ("MWCA"), by its attorneys, hereby requests leave to file a reply in the above-captioned pleading in excess of the 10 page limit set forth in Section 1.429(g) of the Commission's rules. The 10 page limitation on reply comments is premised on Section 1.429(f), which similarly limits oppositions to petitions for reconsideration to 25 pages. In this case, however, Teligent, L.L.C., Microwave Services, Inc., and Digital Services Corporation (collectively, "Teligent") have filed a 36 page opposition. A separate opposition was also filed by Teledesic.

MWCA's request should be granted. The Commission previously granted Teligent a request to exceed the page limits despite Teligent's concession that "many of the arguments raised in [the] . . . petitions [to which it was responding] are similar." Teligent Joint Motion to Exceed Page Limitation at 2. While the Commission noted the benefits of the consolidated oppositions, MWCA believes even greater economies and efficiencies are offered by the filings of trade associations, such as MWCA, which present industry-wide concerns and avoid the need for duplicative filings by individual members. Moreover, as noted in the Opposition to Joint

Motion to Exceed Page Limit of WebCel Communications, Inc. ("WebCel"), Teligent, L.L.C., Microwave Services, Inc., and Digital Services Corporation "are in fact not separate parties, but are all affiliated with the *same corporate entity*." WebCel Opposition at 1 (emphasis in original). Thus, MWCA's request provides a greater economies and a stronger basis for relief than presented previously in Teligent's request.

As the FCC has noted, "the complexity of the issues involved" in this proceeding also warrants a waiver of the page limit rule in this proceeding. Order, DA 97-1409, ET Docket 97-99 (July 3, 1997) at ¶3. Under the circumstances, MWCA's request should be granted forthwith and MWCA permitted to exceed the 10 page limit for replies to oppositions.

Respectfully submitted,

MILLIMETER WAVE
CARRIER ASSOCIATION, INC

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Dated: July 10, 1997

CERTIFICATE OF SERVICE

I, Kimberly Riddick, hereby certify that on this 11th day of July, 1997, I caused copies of the foregoing "Request for Leave to Exceed Page Limit" to be served, by First Class Mail, postage pre-paid, on the following:

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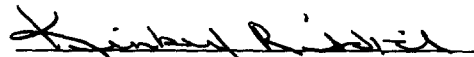
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